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April 27, 2022

The Honorable Maryellen Noreika
U.S. District Court
844 N. King Street
Unit 19, Room 4324
Wilmington, DE 19801-3555

Re: CBV, Inc. v. ChanBond, LLC, et al., C.A. No. 1:21-cv-01456-MN

Dear Judge Noreika,

I write on behalf of Defendants Deirdre Leane and IPNAV, LLC (collectively, the "Leane Defendants"), concerning ChanBond, LLC's April 26, 2022 letter requesting sanctions (D.I. 90).

Leane Defendants join in the relief requested in ChanBond's letter, particularly ChanBond's request for an award of attorneys' fees and costs in connection with Mr. Rader's participation in this Action. Like ChanBond, Leane Defendants have incurred attorneys' fees and costs opposing the baseless Motion to Intervene (D.I. 34) and in connection with Mr. Rader's conduct that gave rise to ChanBond's request for relief. For the reasons stated by ChanBond at the April 25 hearing and in its April 26 letter, if the Court awards ChanBond its attorneys' fees and costs in connection with the Motion to Intervene and Mr. Rader's further involvement in the Action, Leane Defendants respectfully request that they also be awarded their attorneys' fees and costs.

The Honorable Maryellen Noreika
April 27, 2022
Page 2



Counsel are available should the Court have any questions.

Respectfully submitted,

/s/ James H. S. Levine

James H.S. Levine (#5355)

JHSL

cc: All counsel of record